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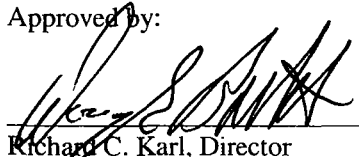
Five-Year Review Report

First Five-Year Review Report For Parson's Casket Hardware Site Belvidere, Illinois

May 2007

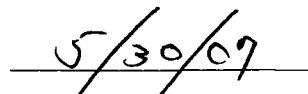
PREPARED BY:
United States Environmental Protection Agency
Region 5
Chicago, Illinois

Approved by:



Richard C. Karl, Director
Superfund Division

Date:



5/30/07

Five-Year Review Report

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U.S. EPA Region 5 List of Acronyms

Include all Acronyms in the report

ARAR - Applicable or Relevant and Appropriate Requirement

AS - Air Sparging

CD - Consent Decree

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

CFR - Code of Federal Regulations

CIC - Community Involvement Coordinator

DCE - 1,2-dichloroethylene

U.S. EPA - United States Environmental Protection Agency

IC - Institutional Control

ISVE - Insitu vapor extraction

MCL - Maximum Contaminant Level

MDOT - Michigan Department of Transportation

NCP - National Contingency Plan

NPL - National Priorities List

O&M - Operation and Maintenance

PCOR - Preliminary Close Out Report

PRB - Permeable Reactive Barrier

PRP - Potentially Responsible Party

PSD - Performing Settling Defendant

RA - Remedial Action

RAL - Remedial Action Level

RAO - Remedial Action Objective

RD - Remedial Design

RI/FS - Remedial Investigation/Feasibility Study

ROD - Record of Decision

SDWA - Safe Drinking Water Act

TCE - Trichloroethylene

VOC - Volatile Organic Compound

Executive Summary

The Illinois EPA (IEPA) as the lead agency used United States Environmental Protection Agency (U.S. EPA) funds to complete the remedial activities on the Parson's Casket Hardware Superfund Site from its discovery in 1983 until the IEPA selected a remedy for the groundwater operable unit in September 2005 which involved other off-property potentially responsible parties (PRPs).

The IEPA broke the site into two operable units: one for on-site soils and one for the much larger groundwater plume. The IEPA selected a remedy for the soils in a Record of Decision (OU1) signed on September 30, 1996, which was concurred upon by U.S. EPA. The selected remedy included excavation and disposal of contaminated soils; excavation and disposal of sludges and contaminated soil from the old lagoon; and removal of dry wells at the site. The limits of the excavation are shown by the four hatched areas on the Overlay Analysis which is Figure 5. The OU1 ROD also included a requirement for institutional controls and deed/zoning restrictions. The existing fence was to be maintained until these institutional controls were implemented. Since the cleanup levels were IEPA soil standards for industrial use, the site's real estate deed was to have been amended to stipulate that if any soils were excavated in the future, they would have to be characterized and disposed of in accordance with the regulations in effect at that time. The ROD also stated that local zoning ordinances were to be imposed to maintain the site for industrial use because residential use would not be protective. Prohibition of on-site groundwater use was also a requirement in that ROD.

On September 29, 2005, IEPA and U.S. EPA selected a remedy to address groundwater contamination in the alluvial and bedrock aquifers that have become contaminated from the Site. The groundwater plume has traveled beyond the property's boundaries and has become commingled with other plumes of contamination from adjacent facilities. The selected remedy included: groundwater treatment to enhance the biodegradation of volatile organic compounds (VOCs); groundwater monitoring to evaluate treatment system effectiveness; natural attenuation downgradient of the treatment areas; institutional controls to prohibit the installation of potable water wells until groundwater is restored to federal maximum contaminant levels (MCLs) for all contaminants of concern; and a contingency for well head treatment of City of Belvidere municipal wells #4 and #6, if they become contaminated.

This Five Year Review is restricted in scope to the remedial action undertaken by the IEPA pursuant to the OU1 ROD (on-site soils) that commenced on December 14, 1998. The OU2 remedial action (groundwater) has not yet commenced but the U.S. EPA just initiated enforcement discussions with additional off-site Potentially Responsible Parties who may be liable for conducting the remedial design and remedial actions called for in the OU2 ROD.

Protectiveness Statement

The soil remedy at the Parsons Casket Hardware Site, OU#1, is protective of human health and the environment in the short term. The wastes and on-site contaminated soils have been removed to levels which the State of Illinois uses for Industrial sites. Furthermore, the Parson's property is currently fenced and is not being used. The Parson's property sits within an area that the City of Belvidere has zoned as General Industrial, which is consistent with the industrial use cleanup standards.

In order for the remedy to be protective in the long-term, effective Institutional Controls (ICs) need to be prepared and implemented to limit excavation and to prohibit residential use on the Parsons property and to prohibit groundwater use throughout the plume until cleanup standards are achieved. Additionally, the ICs must be maintained and monitored to ensure long-term stewardship of the Site.

Five Year Review Summary Form

SITE IDENTIFICATION

Site name (from WasteLAN): Parson's Casket Hardware Company Superfund Site

EPA ID: ILD005252432

Region: 5 **State:** IL **City/County:** Belvidere / Boone

SITE STATUS

NPL status: ☐ Final

Remediation status: ☐ Under Construction

Multiple OUs?* ☐ YES **Construction completion date:** ____ / ____ / ____

Has site been put into reuse? ☐ NO

REVIEW STATUS

Lead agency: ☐ EPA is lead for Five Year Review and RD/RA for OU#2 ☐ IEPA was lead agency for RI/FS and RD/RA of OU#1

Author name: Jon W. Peterson

Author title: Remedial Project Manager **Author affiliation:** U.S. EPA

Review period:** December 14, 1998 to May 2007

Date(s) of site inspection: 11/28/2006

Type of review: Post-SARA

Review number: 1 (first)

Triggering action: Initiation of RA Onsite Construction at OU # 1

Triggering action date (from WasteLAN): 12/14/1998

Due date: 05/30/2007

Issues: Drums of investigation derived waste left at site, Old U.S. EPA Site trailer left at Site, Institutional Controls not implemented,

Recommendations and Follow up Actions:

Drums will be removed and properly disposed of. Trailer will be removed and properly disposed of. An IC Plan will be developed to evaluate and implement groundwater and land use restrictions to prohibit residential use and to require characterization and disposal of any on-site soils that are excavated in the future and to address long term stewardship at the Site.

Protectiveness Statement:

The soil remedy at the Parsons Casket Hardware Site, OU#1, is protective of human health and the environment in the short term. The wastes and on-site contaminated soils have been removed to levels which the State of Illinois uses for Industrial sites. Furthermore, the Parson's property is currently fenced and is not being used. The Parson's property sits within an area that the City of Belvidere has zoned as General Industrial, which is consistent with the industrial use cleanup standards.

In order for the remedy to be protective in the long-term, effective Institutional Controls (ICs) need to be prepared and implemented to limit excavation and to prohibit residential use on the Parsons property and to prohibit groundwater use throughout the plume until cleanup standards are achieved. Additionally, the ICs must be maintained and monitored to ensure long-term stewardship of the Site.

Parson's Casket Hardware Site First Five-Year Review Report

I. Introduction

The purpose of this five-year review is to determine whether the remedy at the site is protective of human health and the environment. The methods, findings and conclusions of this review are documented in the Five-Year Review report. In addition, Five-Year Review reports identify issues found during the review, if any, and identify recommendations to address them.

The Agency is preparing this Five-Year Review report pursuant to CERCLA § 121 and the National Contingency Plan (NCP). CERCLA § 121 states:

If the President selects a remedy that results in any hazardous substance, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgment of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such reviews.

The Agency interpreted this requirement further in the NCP; 40 CFR § 300.430(f)(4)(ii) states:

If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less than every five years after the initiation of the selected remedial action.

The United States Environmental Protection Agency (U.S. EPA), Region 5, conducted this first five-year review of the remedy implemented for OU#1, the Soils Operable Unit at the Parson's Casket Hardware Superfund Site in Belvidere, Illinois. The implementation of the OU#1 Remedial Action (RA) was completed by the Illinois Environmental Protection Agency (IEPA) as lead agency using federal funds. The Five Year Review was conducted by the U.S. EPA Remedial Project Manager (RPM) for the site in 2007 and it covered the time frame from the initiation of the OU1 remedial action in 1998 to the present.

This is the first five-year review for the Parson's Casket Hardware Site. The triggering action for this statutory review is the initiation of remedial action construction which was 12/14/1998. The five-year review is required due to the fact that hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure.

II. Site Chronology

Table 1: Chronology of Site Events

Event	Date
Initial discovery of problem or contamination	April 1, 1983
Pre-NPL responses	1982 – 1985
NPL listing	Proposed 1/22/1987
	Final 7/22/1987
Remedial Investigation/Feasibility Study complete	September 30, 1996
ROD signature for OU#1	September 30, 1996
Remedial design complete OU#1	December 14, 1998
Remedial Action complete OU#1	May 30, 2002
ROD signature for OU #2	September 29, 2005
Site Inspection	November 27-28, 2006
General Notice Letters for OU#2	May 16, 2007

III. BACKGROUND

The Site is on the northeast side of Belvidere, Illinois, and the surface footprint of the Parsons property covers approximately 6 acres (Figure 1). The site is bordered by residential communities to the east and southeast and by various industrial and commercial facilities to the south, west, and north (Figure 2). The Kishwaukee River is approximately 0.25 mile south-southeast of the site. Two of Belvidere's eight municipal water supply wells, Municipal Wells No. 6 and No. 4, are located about 1,500 feet northwest and 0.5 mile southwest of the site, respectively (Figure 3). Both wells are used by the City of Belvidere on a daily basis. High-capacity industrial supply wells also are located in the area south of the Kishwaukee River.

Parsons Casket Hardware Company manufactured decorative metal fittings for caskets at the site from the early 1900s to 1982. The manufacturing operations required use of hazardous chemicals, and hazardous waste by-products were generated as a result of the manufacturing process. The company was purchased by the Dickey-Grabler Company in 1979, at which time its name was changed to the Parsons Company. The Parsons Company continued to operate on site until it filed for bankruptcy in August 1982. Wastes generated on site consisted mainly of electroplating sludge; cyanide plating solution; cyanide cleaning solutions; bronze, nickel, brass sludges; and cleaning solvents.

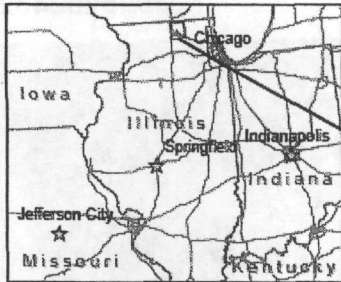
Site Location

Superfund
U.S. Environmental Protection Agency

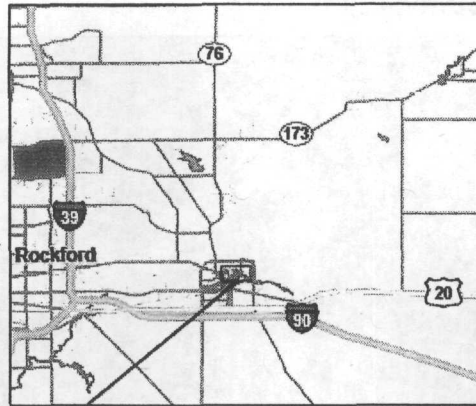


Parson's Casket Hardware
Boone County, IL

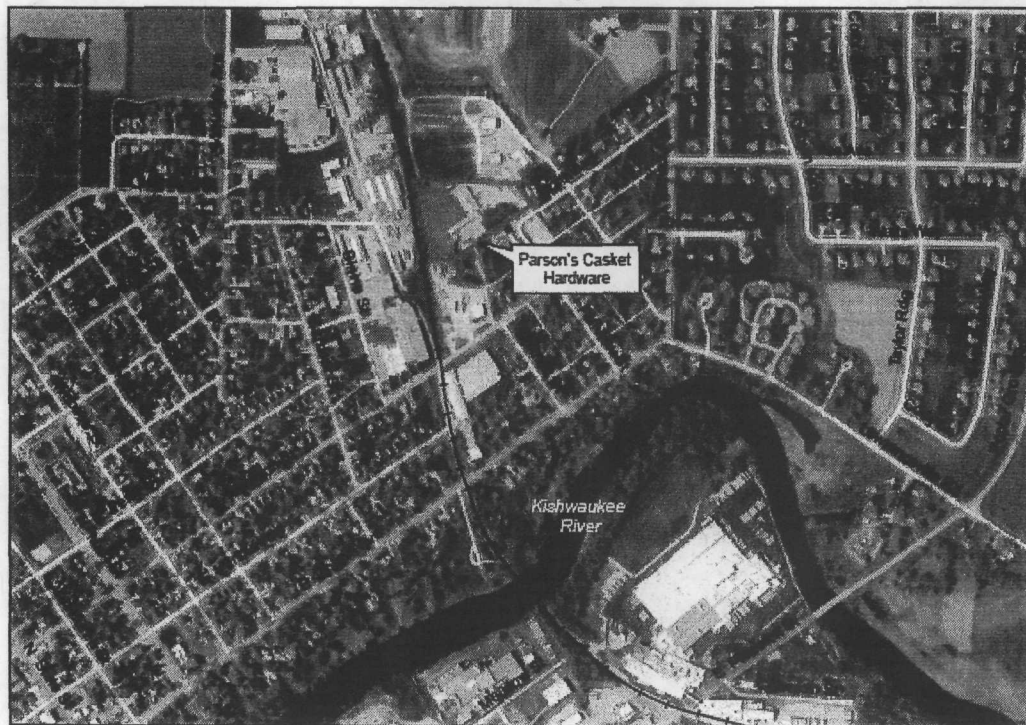
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State



County



Site

Created by Sarah Backhouse
U.S. EPA Region 5 on 5/8/07
Image Date: 2006



Figure 1



**Parson's Casket Hardware
Boone County, IL**

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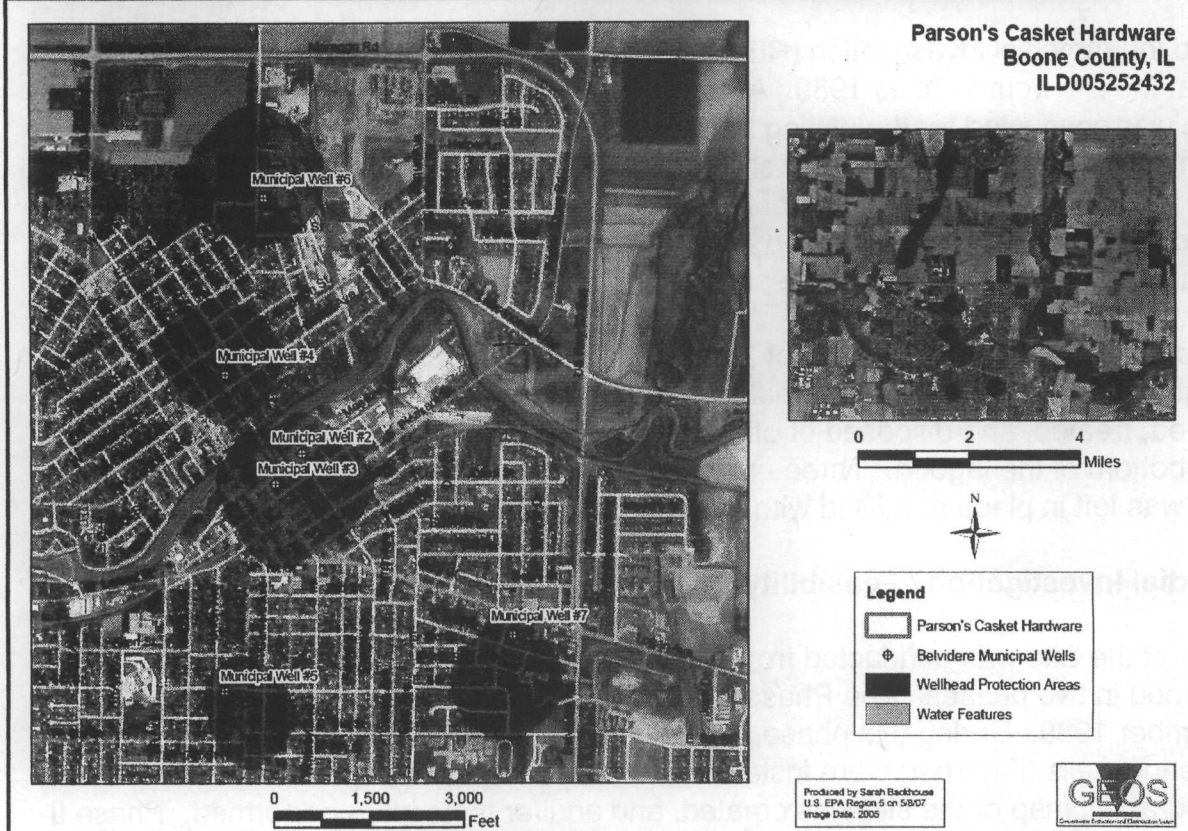


Elevation Feet	
	936 - 961
	912 - 936
	887 - 912
	863 - 887
	838 - 863
	814 - 838
	789 - 814
	765 - 789
	740 - 765



Produced by Sarah Backhouse
U.S. EPA Region 5 on 5/10/07

Figure 2

**Figure 3**

History of Contamination

A series of aerial photographs taken from 1937 to 1986 show activities that occurred at the site and features that no longer exist. For example, a lagoon was one of the principal waste disposal locations shown, and a railroad spur is visible in a few of the aerial photographs. Reportedly, liquid wastes were disposed of along the railroad spur prior to construction of the lagoon.

The west wing of the existing facility at the site was used for die-casting and remelting of metals. The most commonly used metals were lead, brass, die-cast steel, white metal, silver, and zinc. Reportedly, the facility used small volumes of diluted cyanide solutions in the west wing operations and large quantities of alkaline compounds and sulfur.

The east wing of the facility housed finishing operations. Cyanide treatment and electroplating were conducted on the first floor of this wing, and trichloroethene (TCE) treatment and refurbishing of metals were performed on the second floor. Reportedly, approximately 10 dry wells on the north side of this wing were used for disposal of cyanide waste sludge.

Pre-Remedial Activities

Prior to the remedial investigation (RI), preliminary investigations were conducted by IEPA at the site from 1982 to 1989. As part of the August 1982 IEPA investigation, testing was conducted for the plating solutions found in the drums and tanks and for lagoon sediment. Analytical results showed that the plating solutions and sediment contained elevated concentrations of heavy metals. Two private wells located about 0.5 mile from the site were also sampled for inorganic chemical analysis but no inorganic contaminants were detected in the samples at concentrations above state standards.

IEPA conducted a partial cleanup of areas outside the site building from fall 1984 through spring 1985. Waste materials, including lagoon liquids and sludge, were removed, treated, and disposed of off site. A 1-foot-thick sludge seam was uncovered at the bottom of the lagoon. Three underground storage tanks were removed; and a fourth was left in place and filled with sand.

Remedial Investigation / Feasibility Study

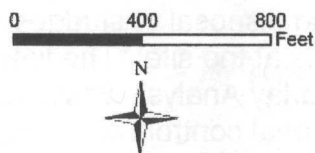
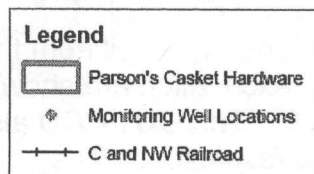
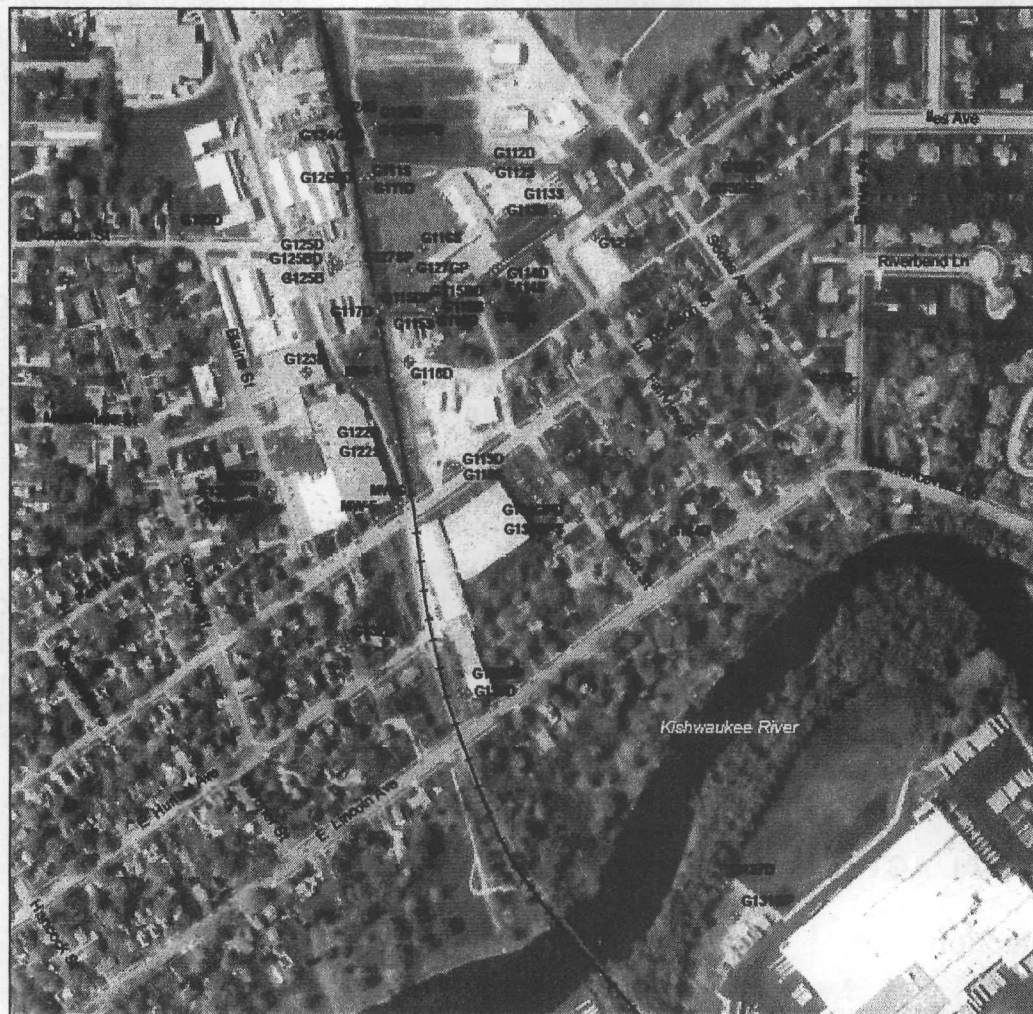
The RI at the Site was conducted from 1989 to 1992. Field investigations were performed in two phases. The Phase I field investigation was conducted from May to September 1989. During this phase, 23 soil borings were drilled and sampled, 13 monitoring wells (Figure 4) were installed and two rounds of sampling were completed, a topographic map of the site was created, and aquifer tests were performed. Phase II field investigation efforts were conducted from July 1990 to January 1991. During Phase II, 11 soil borings were drilled and sampled, a groundwater "plume chasing" program was conducted, 15 monitoring wells and one extraction well (which was designed to recover hydrocarbons floating on top of groundwater) were installed, and packer sampling and aquifer testing were performed in the three deep bedrock boreholes by the U.S. Geological Survey (USGS). Phase II work also included preparation of geophysical logs for the three deep bedrock boreholes, aerial and land surveying to update the site map, and two rounds of sampling and analysis for all Phase I and II monitoring wells. Detailed results of the RI are provided in the final RI Report (SAIC 1992).

Four rounds of groundwater sampling were conducted during Phases I and II of the RI. Phase I monitoring well locations were selected based on review of regional geological information, site-specific geologic information previously collected by IEPA, and the IEPA file sources used to select soil sampling locations. Groundwater sampling rounds 1 and 2 were conducted during Phase I and consisted of sampling of 13 monitoring wells in June and September 1989, respectively.

During Phase II, groundwater sampling rounds 3 and 4 consisted of sampling the 13 Phase I wells and the 16 newly installed Phase II wells in December 1990 and January 1991, respectively. In addition, three monitoring wells (MW-1, MW-5, and MW-6) were sampled at the Taptite Production Facility of Camcar/Textron, Inc., a manufacturing operation adjacent to the Parson site. Groundwater elevations were measured to

Parson's Casket Hardware
Boone County, IL

ILD005252432



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U.S. EPA Region 5 on 5/8/07
Image Date: 2006

Figure 4

determine approximate groundwater flow directions and velocities. Analytical data collected from all four rounds of sampling were used to assess the vertical and lateral extent of groundwater contamination. In addition, the groundwater quality upgradient of the site was investigated.

Residential wells located near the site were also sampled. The purpose of the private well evaluation was to assess whether nearby private wells were being impacted by the Parson site. Eight private wells located between 0.5 and 1.5 miles from the site were sampled. The samples were collected directly from taps that were in line with the private wells. The samples were analyzed for VOCs, semivolatile organic compounds (SVOCs), dissolved metals, and cyanide.

In addition, U.S. EPA performed aquifer testing using Phase I monitoring wells. The hydraulic conductivities of the aquifer beneath the site were determined through rising and falling head slug tests. Also, USGS conducted packer sampling tests in three 150-foot bedrock boreholes and one 300-foot bedrock borehole. The purpose of the packer sampling tests was to determine the vertical distributions of VOCs within the boreholes and the hydraulic properties of the bedrock under the site.

The RI culminated with the submittal of a final RI report in September 1992 (SAIC 1992). After IEPA and U.S. EPA review of the document, it was concluded that sufficient data were available to select a soil remedy, but additional data were needed to further characterize the extent of groundwater contamination. Therefore, two operable units (OUs) were established: OU1 was intended to address the soil contamination on the site and OU2 was intended to address the groundwater contamination. The OU1 remedial action was completed in 2002 and the IEPA prepared a Record of Decision (ROD) in September 2005 for OU2, but this remedial action has not been started.

IV. REMEDIAL ACTIONS

Remedy Selection

The IEPA selected a remedy for the soils in a Record of Decision (OU1) signed on September 30, 1996. The selected remedy included excavation and disposal of contaminated soils, excavation and disposal of sludges and contaminated soil from the old lagoon and removal of dry wells at the site. The limits of the excavation are shown by the 4 hatched areas on the Overlay Analysis which is Figure 5. The OU1 ROD also included a requirement for institutional controls and deed/zoning restrictions. The existing fence was to be maintained until these institutional controls were implemented. Since the action levels used by IEPA for this Site were the IEPA soil standards for industrial use, the site's real estate deed was to have been amended to stipulate that if any soils were excavated in the future, they would have to be characterized and disposed of in accordance with the regulations in effect at that time. The ROD also stated that local zoning ordinances were to be imposed to maintain the site for industrial use because residential use would not be appropriate. Prohibition of on-site groundwater use was also a requirement in that ROD.

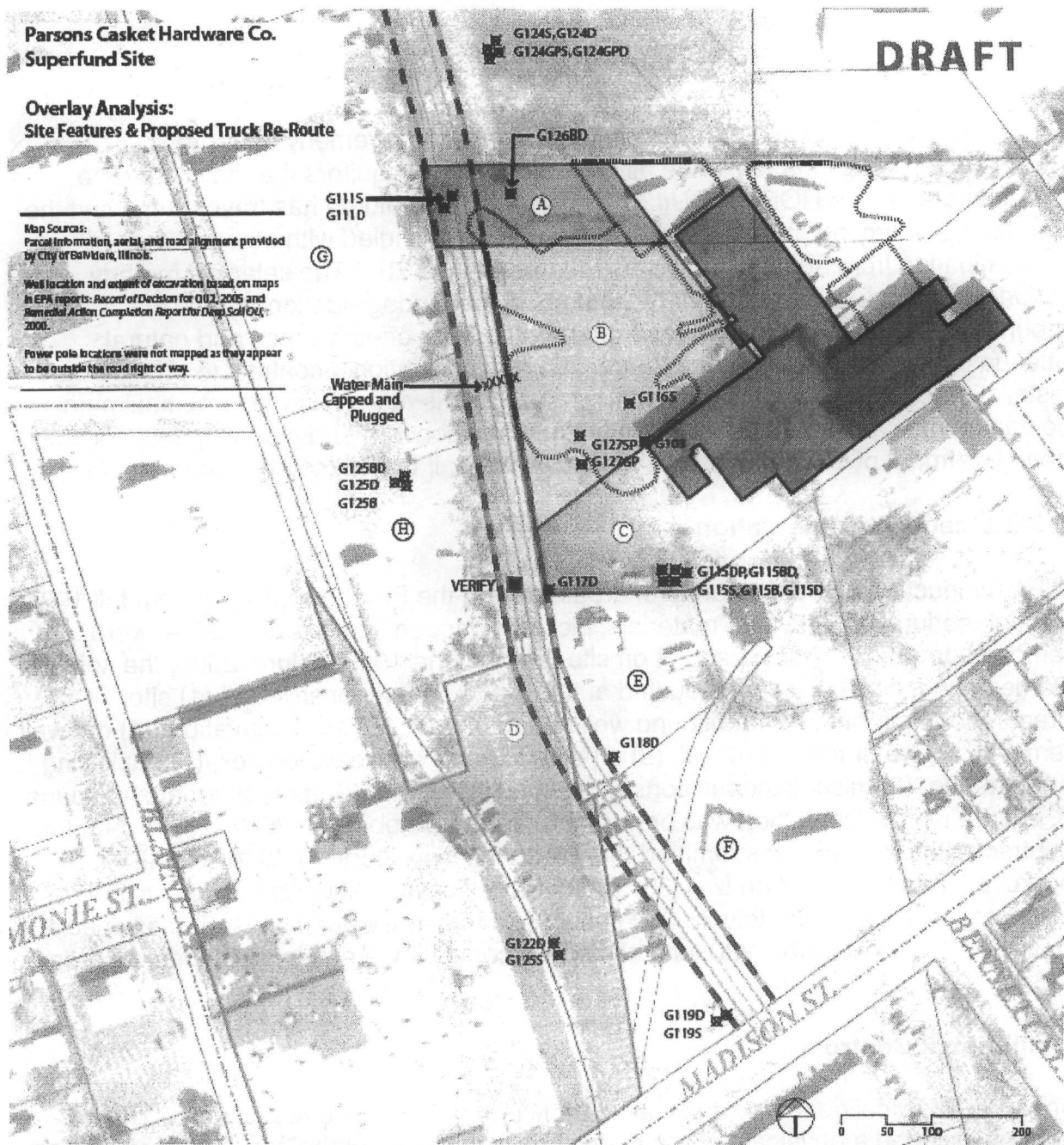
**Parsons Casket Hardware Co.
Superfund Site**

**Overlay Analysis:
Site Features & Proposed Truck Re-Route**

Map Sources:
Parcel information, aerial, and road alignment provided
by City of Belvidere, Illinois.

Well location and extent of excavation based on maps
in EPA reports: Record of Decision for OUG-2, 2005 and
Remedial Action Completion Report for Deep Soil OUG-2,
2006.

Power pole locations were not mapped as they appear
to be outside the road right of way.



LEGEND

Tax Parcel Information

- (A) 05-24-251-020
Belvidere Bank & Trust
- (B) 05-25-127-018
Barrick Switzer & Long
- (C) 05-25-127-023
Belvidere Bank and Trust
- (D) 05-25-104-009
Textron Inc.

- (E) 05-25-127-016
Balsam, Russel & David
- (F) 05-25-127-007
Balsam, Russel & David
- (G) 05-25-127-021
United BK of IL
- (H) 05-25-127-022
Corday, James & Paulsen JA

Approx. Well Location and ID #
(within 200 ft of roadway) G117D

Approx. Extent of Soil Excavation

Proposed Truck Re-Route

Former Parsons Casket Hardware Bldg
(Current Deveco Inc. Operations)

Figure 5 – Overlay Analysis

On September 29, 2005, U.S. EPA and IEPA selected a remedy to address groundwater contamination in the alluvial and bedrock aquifers that have become contaminated in the ROD for OU#2. The groundwater plume has traveled beyond the Parson's property boundaries and has become commingled with other plumes of contamination from adjacent facilities (Figures 7a and 7b). The selected remedy included: groundwater treatment by enhancing the biodegradation of VOCs, groundwater monitoring to evaluate treatment system effectiveness and natural attenuation downgradient of the treatment areas; institutional controls to prohibit the installation of potable water wells until groundwater is restored to federal maximum contaminant levels (MCLs) for all contaminants of concern and a contingency for well head treatment of City of Belvidere municipal wells, if they become contaminated.

Soil Remedy Implementation

IEPA conducted a partial cleanup of areas outside the Parson's building from fall 1984 through spring 1985. Waste materials, including lagoon liquids and sludge, were removed, treated, and disposed of off site. From June 1999 to June 2000, the soil OU Remedial Action (RA) was conducted at the site. The RA consisted of (1) site preparation activities, (2) monitoring well abandonment, (3) soil excavation, (4) dry well removal, (5) water main removal, (6) off-site disposal of excavated soil, (7) backfilling and grading, (8) miscellaneous construction activities, and (9) air monitoring. On June 8, 2000, the final inspection was performed, and on October 12, 2000, Tetra Tech (the contractor hired by IEPA) submitted the RA completion report to IEPA. The IEPA approved the RA Report on May 30, 2002. Based on landfill weight tickets, it is estimated that approximately 73,000 tons of site material were disposed of as special waste, and approximately 280 tons of dry well contents were disposed of as hazardous waste.

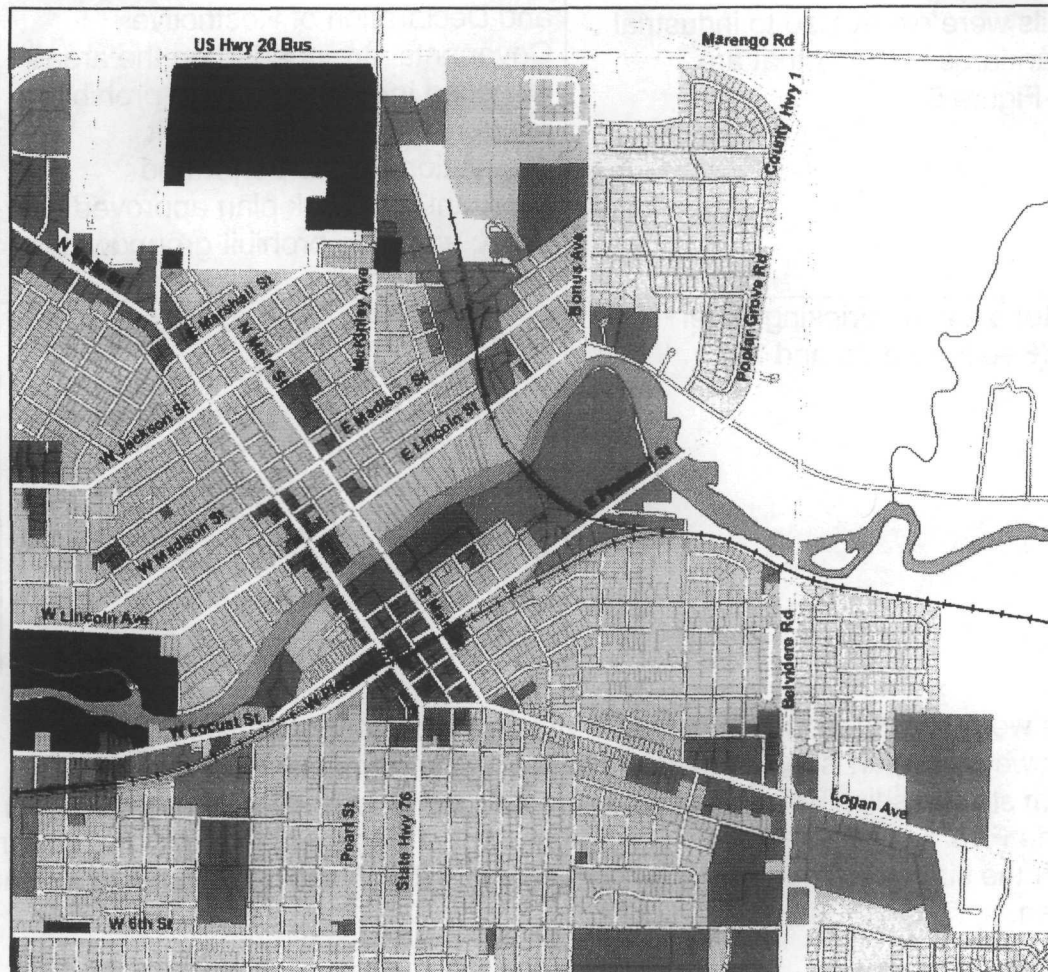
Institutional Controls

The OU1 ROD called for institutional controls and deed/zoning restrictions. This remedy included a physical access restriction via upgrade of the existing fence and/or installation of warning signs on the fence. The physical access restriction (fence) is still in place. The institutional controls and deed restrictions have not been implemented. The City of Belvidere Zoning Map (Figure 6) shows that the Parson's Site is zoned for industrial use. The site's property deed was to have been amended and local zoning ordinances imposed to maintain the site for industrial use. On-site groundwater use was to be restricted and there were to be restrictions such that any soils excavated from the site were properly characterized and disposed of.

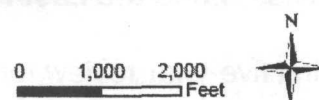
Institutional Controls (ICs) are non-engineered instruments, such as administrative and legal controls that help to minimize the potential for exposure to contamination and that protect the integrity of the remedy. ICs can be required to assure long-term


Parson's Casket Hardware
Boone County, IL

ILD005252432

**Legend**

Parson's Casket Hardware	NO - Neighborhood Office	SR-4 Single Family - 4
C and NW Railroad	PO - Planned Office	SR-6 Single Family - 6
Water Features	GI - General Industrial	TR-7 Two Family - 7
CB - Central Business	PI - Planned Industrial	MR-BS Multi-Family - BS
GB - General Business	HI - Heavy Industrial	MR-8L Multi-Family - 8L
PB - Planned Business	I - Institutional	RH - Rural Holding
NB - Neighborhood Business	SR-3 Single Family - 3	


 Produced by Sarah Backhouse
 U.S. EPA Region 5 on 5/8/07

*Zoning data provided by the Belvidere - Boone County Planning Department

Figure 6

protectiveness for any areas which do not allow for unlimited use or unrestricted exposure (UU/UE).

Within seven months of this review, an Institutional Control Plan will be prepared to evaluate and implement institutional controls for the following areas:

Media, Engineered Controls, & Areas that Do Not Support UU/UE Based on Current Conditions	Institutional Control Objective /Restriction/Performance Standard
On-Site soils were excavated to industrial cleanup standards in areas that are hatched in Figure 5	Environmental Protection Easement and Declaration of Restrictive Covenants are needed on the areas identified in Figure 5: a) to prohibit residential use; b) to prohibit excavation unless performed pursuant to a work plan approved by IEPA; and c) to prohibit groundwater use.
Groundwater exceeds drinking water standards (See Figure 7a and 7b)	The 2005 ROD states that restrictive covenants may be placed on properties over the plume to prohibit shallow groundwater withdrawal for potable uses until drinking water standards (the more stringent of MCLs or Illinois class I groundwater standards) are attained.

No activities were observed that would have violated the intent of these institutional controls. However, a plan is required for evaluation and implementation of effective ICs, and long-term stewardship. The IC Plan will be developed by U.S. EPA and IEPA within 6 months of the Five Year Review or by November 2007. Maps which depict the current conditions of the site and areas which do not allow for UU/UE will be developed as part of the IC Plan.

V. Progress Since the Last Five-Year Review

This is the first five-year review for this site.

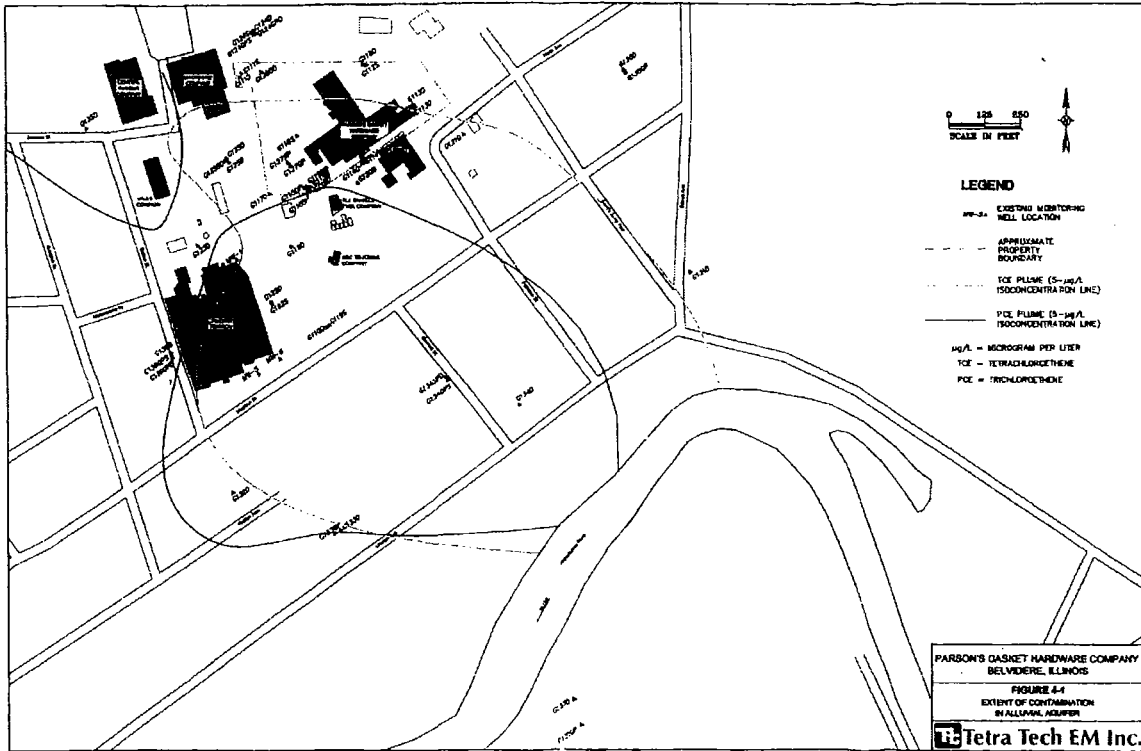


Figure 7a – Groundwater Contamination in Alluvial Aquifer

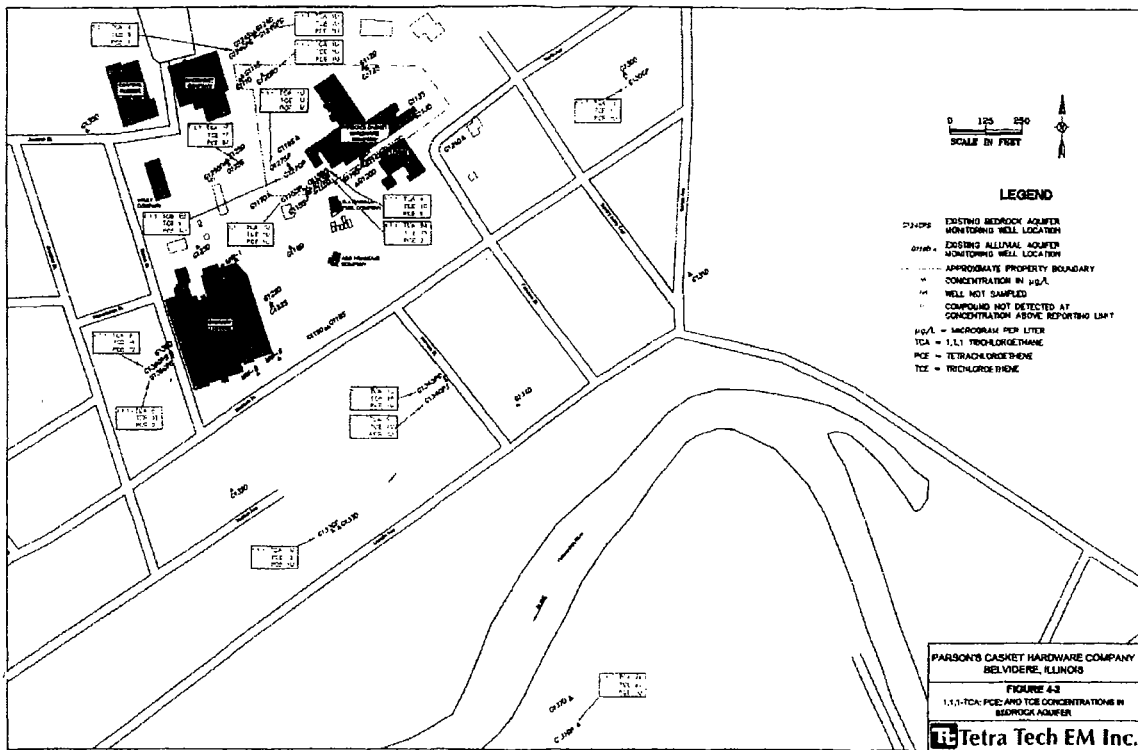


Figure 7b – Groundwater Contamination in Bedrock Aquifer

VI. FIVE YEAR REVIEW PROCESS

Administrative Components

The U.S. EPA had the lead role in executing the five year review for the Site. The IEPA supported the U.S. EPA in this five year review. The members of the review team included:

- U.S. EPA RPM: Jon Peterson
- U.S. EPA CIC: Stuart Hill and Mike Joyce
- U.S. EPA Attorney: James Cha
- IEPA PM: Sandra Bron
- U.S. EPA GEOS Team: David Wilson, Andrea Porter, Sarah Backhouse
- U.S. EPA Superfund Redevelopment Coordinator: Thomas Bloom

Community Notification

The community was informed of the start of this five-year review process via a Public Notice Ad that was posted in the Rockford Register Star on Thursday March 22, 2007. A copy of this ad is shown to the right. A follow-up announcement will be published notifying the community of the completion of the five-year process.

Document Review

Documents reviewed for this five-year review are referenced in the list of Documents Reviewed at the end of this document.

Data Review


Refer to the Technical Assessment Portion of this five-year review for more detailed information and to the end of this document for a list of documents reviewed.

Site Inspection

The Site Inspection was held on November 28, 2006. The participants in the Site Inspection included: Jon Peterson – U.S. EPA Region 5 RPM, Tom Bloom - U.S. EPA Region 5 Re-Use Coordinator, James Cha – Region 5 Site Attorney, Terry Ayers – Manager NPL Unit, IEPA, Fred Brereton – Mayor of Belvidere, Dan Stanton and Lisa Norgard – Deveco Corporation (onsite operating business), James Wilkinson and Alisa Hefner – U.S. EPA's Re-Use Contractor.

Inspection participants walked the Parsons Casket Hardware Company property, which comprises several acres of open space adjacent to building currently operated by Deveco Corporation. Observed features included a trailer, approximately 20 empty drums, and piles of wood debris located in the southeastern corner, an electric utility line that extends north-south across the center of the property, and several existing

IDA Clinical Ref. ROCKFORD REGISTER STAR | THURSDAY, MARCH 22, 2007 | 7B 0600



EPA To Review
Parson's Casket Hardware Superfund Site
Belvidere, Illinois

U. S. Environmental Protection Agency is conducting a status review of the Parson's Casket Hardware Co. Superfund site. EPA policy requires regular reviews, at least every five years, where the cleanup is ongoing or completed with hazardous waste remaining managed on-site. These reviews are to ensure the cleanup continues to protect human health and the environment.

The review will concentrate on the effectiveness of the soil cleanup done by the Illinois Environmental Protection Agency in 2002. The review will also include background information and cleanup requirements from earlier EPA decisions.

The five-year review report is scheduled to be completed by late spring and will be available at the repository listed below.

Further information can be obtained by contacting:

Jon Peterson
EPA Remedial Project Manager
(800) 621-8431, Ext. 3-1264, weekdays 9 a.m. -4:30 p.m.
peterson.jon@epa.gov

Site-related documents are available for review at:

Ida Public Library
320 N. State Street
Belvidere, Ill.

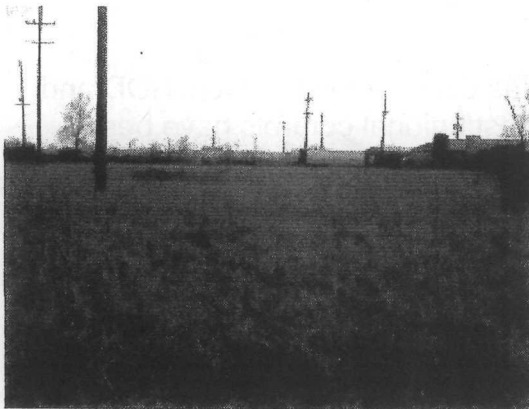
Parsons Casket Hardware Company Site Photographs



Trailer and drums on-site



View northwest, wood debris in foreground



View northeast across the site



View east towards buildings owned by Deveco Corp.



View south along site's western boundary and proposed road route



Monitoring wells located along western boundary of the site

groundwater monitoring wells located in the northwest and southwest corners of the property. Vegetation consisted mostly of grasses and groundcovers, with trees located along the western edge. The property is fenced and its topography is flat. The trailer was the old U.S. EPA Site trailer that had been left there since the time of the RI/FS. The drums, pallets and stacks of wood were left over from the IEPA's completion of the Groundwater OU Feasibility Study and included drums of investigation derived wastes from IEPA's conduct of off-property sampling in 2002.

VII. Technical Assessment

Question A: Is the remedy functioning as intended by the decision documents?

No.

The IEPA removed wastes and contaminated soils as called for in the OU1 ROD and left the fence around the site intact but none of the institutional controls have been implemented. The OU1 ROD also contained institutional controls intended to maintain the property for industrial use and require characterization and disposal of any site soils that were excavated in the future and on-site groundwater use was to be prohibited.

However, there is no direct exposure pathway because the site fence is still intact. To function as intended by the decision documents, effective ICs must be implemented, monitored and maintained.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

Yes. The OU1 Remedial Action addressed four distinct areas of the Site that contained contaminant concentrations exceeding applicable cleanup standards. To ensure that soil with contaminant concentrations exceeding cleanup standards was excavated during the RA, performance standards were developed during the RD for the following VOCs: tetrachloroethene (PCE); TCE; 1,2-dichloroethene (DCE); and 1,1,1-trichloroethane (TCA). Performance standards were also developed for the following metals: copper, nickel, lead, zinc, cyanide, arsenic, and chromium. The performance standards for metals were based on toxicity characteristic leaching procedure (TCLP) analysis. Table 1 presents the performance standard concentrations.

TABLE 1

CONTAMINANT	PERFORMANCE STANDARD
Tetrachloroethene	60 µg/Kg
Trichloroethene	60 µg/Kg
1,2-Dichloroethene	400 µg/Kg
1,1,1-Trichloroethane	2,000 µg/Kg
Copper	650 µg/L
Nickel	100 µg/L
Lead	7.5 µg/L
Zinc	5,000 µg/L
Cyanide	200 µg/L
Arsenic	50 µg/L
Chromium	100 µg/L

The groundwater cleanup has not yet begun but the more stringent of either the State of Illinois Class II groundwater standards or the federal MCLs will be applicable to that cleanup.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

Yes. There are approximately 20 drums of investigation-derived waste left at the Site by the IEPA during its conduct of the OU1 remedial action. There is an old U.S. EPA site trailer present at the Site that has been left since the time of the RI and the wheels of the trailer are sunken into the mud up to their axles. The City of Belvidere wishes to extend its truck route along the western edge of the Site. Figure 5 (the overlay analysis) shows the proposed truck route and the areas of site soils that will be impacted. Several of the monitoring wells installed during the RI/FS are also within the planned truck route. It may be necessary to move or modify (flush mount) the monitoring wells that are within the planned truck route.

In November 2006, U.S. EPA provided a contractor to assist the City of Belvidere with reuse at the site under the Superfund Redevelopment Initiative (SRI) Program. Preliminary results concluded that one of the City's top priorities is the extension of an alternative truck route in the vicinity of the site. One result of this meeting is Figure 5 - Overlay Analysis, which shows the location of the proposed truck route, monitoring well locations and tax parcel information. U.S. EPA will ensure that the remedy for OU1 remains protective during truck route construction activities and in the long-term during reuse of the portion of the site where the truck route is located.

Technical Assessment Summary

The technical assessment conducted for this five year review concludes generally that the remedy was constructed in accordance with the requirements of the OU#1 Record of Decision (ROD) dated September 1996. However waste materials and a site trailer were left on-site and the deed restrictions were not implemented.

VIII. Issues

Issues identified during the technical assessment and other five-year review activities are provided in Table X below:

Issues

Issues	Affects Current Protectiveness (Y/N)	Affects Future Protectiveness (Y/N)
Drums of investigation derived waste left at site	No	Yes
Old U.S. EPA Site trailer left at Site	No	No
Institutional Controls not implemented	No	Yes

IX. Recommendations and Follow-up Actions

Recommendations and Follow-up Actions

Issue	Recommendations and Follow-up Actions	Party Responsible	Oversight Agency	Milestone Date	Affects Protectiveness (Y/N)	
					Current	Future
Drums of investigation derived waste left at site	Drums will be removed and properly disposed of.	IEPA	U.S. EPA	6/30/2008	N	Y
Old U.S. EPA Site trailer left at Site	Trailer will be removed and properly disposed of.	U.S. EPA	IEPA	6/30/2008	N	N

Issue	Recommendations and Follow-up Actions	Party Responsible	Oversight Agency	Milestone Date	Affects Protectiveness (Y/N)	
					Current	Future
Institutional Controls not implemented	An IC Plan to evaluate and implement groundwater and land use restrictions: a) to prohibit residential use and to prohibit excavation on the former Parson's property; b) to prohibit groundwater use throughout the plume until groundwater cleanup standards are achieved; and c) to address long term stewardship at the Site.	U.S. EPA	IEPA	11/30/2007	N	Y

X. Protectiveness Statements

The soil remedy at the Parsons Casket Hardware Site, OU#1, is protective of human health and the environment in the short term. The wastes and on-site contaminated soils have been removed to levels which the State of Illinois uses for Industrial sites. Furthermore, the Parson's property is currently fenced and is not being used. The Parson's property sits within an area that the City of Belvidere has zoned as General Industrial, which is consistent with the industrial use cleanup standards.

In order for the remedy to be protective in the long-term, effective Institutional Controls (ICs) need to be prepared and implemented to limit excavation and to prohibit residential use on the Parsons property and to prohibit groundwater use throughout the plume until cleanup standards are achieved. Additionally, the ICs must be maintained and monitored to ensure long-term stewardship of the Site.

XI. Next Review

The next five-year review for the Parsons Casket Hardware Superfund Site is required five years from the signature date of this review.

LIST OF DOCUMENTS REVIEWED

Remedial Action Completion Report for Deep Soil Operable Unit Parson's Casket Hardware Company Superfund Site, Belvidere, Boone County, Illinois – Prepared for IEPA by Tetra Tech on October 12, 2000.

Record of Decision for Parsons Casket Hardware – Soils Operable Unit – Prepared by IEPA for U.S. EPA on September 30, 1996.

Record of Decision for Parson's Casket Hardware – Groundwater Operable Unit – Prepared by IEPA for U.S. EPA on September 29, 2005.

Rockford Register Star – Thursday March 22, 2007

Groundwater Operable Unit Feasibility Study Report – prepared for IEPA by Tetra Tech and Dated August 28, 2003.

Meeting Summary Report – Prepared for U.S. EPA by E-squared Re-Use contractor dated December 12, 2005.